



Assessment of Value Report 2020

Waystone Management (UK) Limited
WS KLEINWORT HAMBROS GROWTH FUND*



Why we have produced this report?

As part of a move to strengthen fund governance, the regulator, the Financial Conduct Authority (“FCA”), has required asset managers to conduct an annual review of UK-domiciled funds to assess whether they provide good value to their underlying investors. This is now the second year of reporting for the WS Kleinwort Hambros Growth Fund.

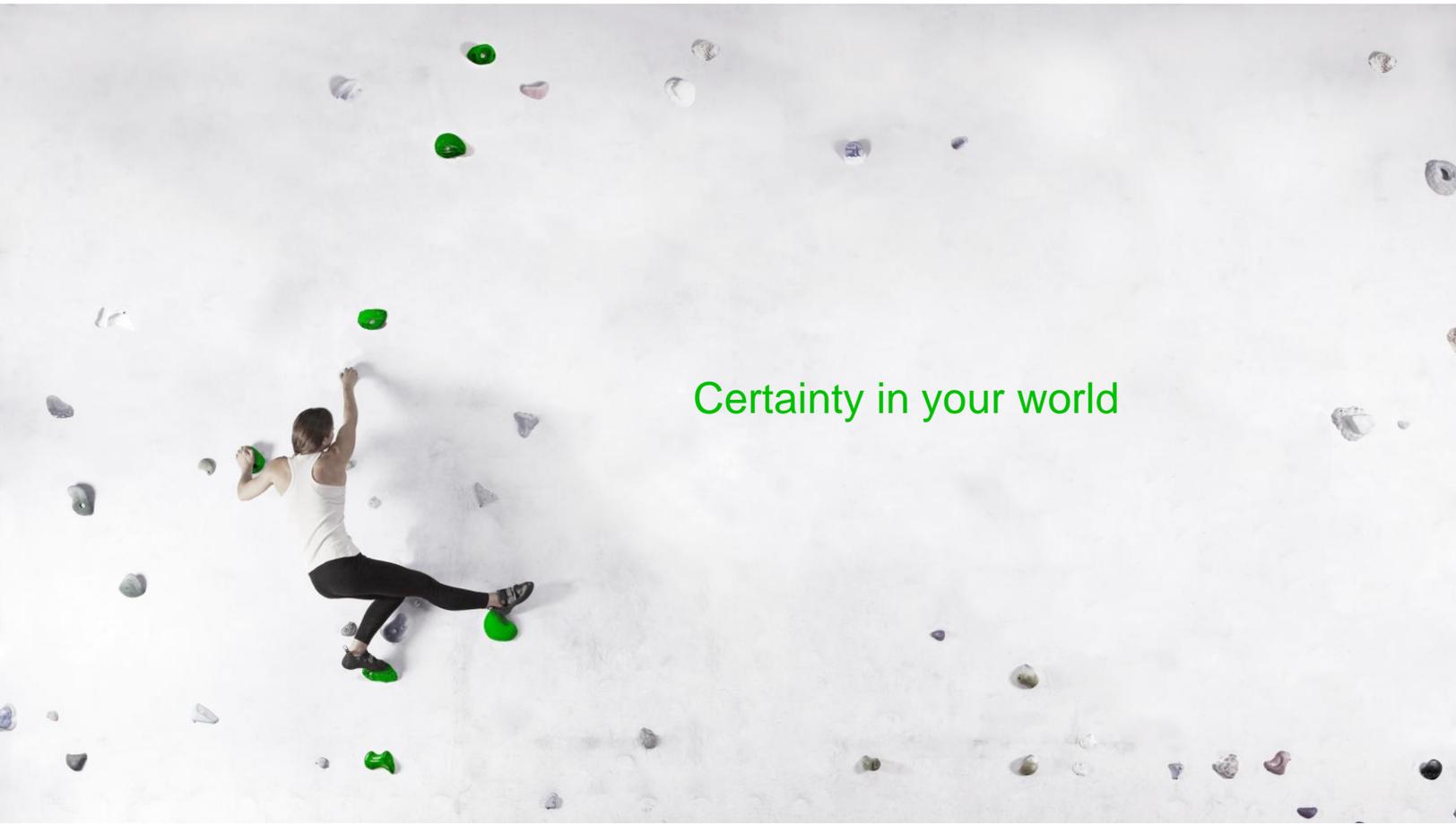
This Assessment of Value report is aimed at individuals who invest within the funds, or their financial advisers. It outlines each fund’s assessment and concludes on whether the Board believe that the fund has demonstrated good value. Where relevant, we also outline what measures we, as the Authorised Corporate Director (“ACD”), are putting in place where the ACD Board believe the value provided does not meet our own high standards.

We believe the assessment of value exercise should make it easier for investors to evaluate whether their investment manager is providing them with value for money, so they can make more informed decisions when choosing investment providers.

What is the assessment of value?

Our intention is that this report is a transparent and accessible view to the assessment of performance, cost and service as at 31st December 2020. The ACD, through its Board of Directors, has a responsibility to ensure that your funds are managed appropriately and that these deliver value for money to you as a fund investor

The assessment of whether each of our funds is providing value to investors has been evaluated using the seven criteria introduced by the FCA. The way in which the Board has assessed these criteria is explained below.



Certainty in your world

The 7 criteria and how we have assessed them

We have chosen to group the criteria into three categories: Performance, Quality of Service and Costs (and charges).

1. Performance

We have assessed the investment performance of the Fund against both its stated investment objective, as well as against any target or comparator benchmarks that are set out in its prospectus. We considered whether the Fund has performed as expected, given the market conditions and its investment philosophy, strategy and implementation. We have deemed it most appropriate to use a full five-year period for the assessment as we feel this is representative of a typical investment cycle and aligned to the time period employed by the Key Investor Information Document (KIID). Any fund launched more recently without a five-year track record, will be assessed on a “from inception” to present basis.

2. Quality of service

We have taken a holistic view when approaching this category by assessing the following:

- **Fund services:** These are operational activities that are core to the smooth running of our funds and include, for example, determining the daily price of the share classes of a fund and ensuring that investors receive their interest and dividend payments in a timely manner.
- **Engagement and Communications:** Here we have considered the quality of our investor servicing including, for example, how we address investor queries and resolve complaints, as well as the quality, breadth and accuracy of the information we provide.
- **Governance:** It is important to ensure that funds are managed and operated in the best interests of investors. We have therefore considered whether an appropriate and effective control environment and robust risk framework are in place.

3. Costs (and charges)

The remaining criteria can be considered under the cost (and charges) umbrella and split out as follows:

3.1. AFM cost

We have assessed the costs incurred by us, as ACD, for providing the services to the funds, relative to the fees charged to you for those services. To perform this exercise each fund's OCF (Ongoing Charges Figure – the total cost associated with running a fund) has been broken down into the Annual Management Charge (AMC), audit and tax fees, service fees (depository, custody and other administration) and any underlying fund costs. This drill down of these costs has been analysed.

3.2. Classes of shares

The UK investment industry had a legacy of share classes with higher fees, largely relating to share classes that existed before the changes instigated by the Retail Distribution Review. Where a range of different share classes may be offered to investors, our assessment of this criterion has considered whether share classes within each fund are properly priced and whether investors are invested in the most appropriate share class that is available to them.

We have also considered how we ensure ongoing suitability of pricing and will continue to monitor whether investors remain in the most appropriate share class. Finally, a review and discussion were held on the merits of continuing to offer each share class.

3.3. Comparable market rates

This relates to the charges in relation to funds managed by other firms. We assessed whether the charges investors pay are in line or favourable when compared to similar funds available in the market. In all instances, we measured our costs against costs charged by the fund’s Investment Association sector peer group median. These categories are independently classified based on fund strategies and objectives.

3.4. Economies of scale

We have considered two aspects when looking at this criterion.

- Firstly, as a fund grows, are we able to pass on economies of scale to our investors? We should be able to do this as fixed costs will fall in relative terms as the overall fund size increases.
- Secondly, we can leverage better relationships and processes to bring efficiency and lower charges to the funds

3.5. Comparable services

This criterion looks internally, where we consider charges for each fund against comparable services provided elsewhere across the range of products that we offer and how reasonable these are where offered to different client types, e.g., institutional mandates. These should be comparable in terms of strategy, investment remit and investor outcome.

Summary Results

	Quality of service	Performance	Costs	Overall Assessment of Value
WS KLEINWORT HAMBROS GROWTH FUND				

Key

- Green = delivering overall value
- Amber = delivering fair value
- Red = not delivering value consistently

Detailed Results

Performance

The fund has met its performance target in terms of providing capital. The fund is marginally behind the comparator benchmark over 5 years.

Fund	5 year fund annualised returns	Comparator benchmark	5 year Benchmark annualised returns	Fund objective
WS Kleinwort Hambros Growth Fund	6.85%	Morningstar UK Moderately Adventurous Allocation peer group	7.02%	To provide a return in the form of capital appreciation over the long term.

Source: Morningstar as at end of December 2020

Quality of service

The Board have concluded that, taking all factors into account, the level of service achieved meets investors' expectations based on the criteria set out above.

Costs (and charges)

AFM Costs: Having split out the costs of running the fund as described in section 3.1 above, the Board have reviewed and assessed them and concluded they are reasonable and appropriately managed.

Classes of Shares: Based on the information available to us, our review concluded that it is appropriate for investors in these funds to be invested in the share class they are invested in. There is a clear differential in fee between the A Class and C class that is based on the level of investment made by the investor.

Comparable Market Rates: The WS Kleinwort Hambros Growth fund is more expensive than peers and the reasons are outlined in the update of actions from the 2019 assessment of value in the final section below.

Share class	OCF date	Share class OCF	IA sector median
WS Kleinwort Hambros Growth A Acc	31/10/2020	2.07	1.17

Note: The fund OCF is the latest published OCF available as at the 31st of December 2020.

Economies of Scale: The Board have concluded that any cost savings which have been obtained from economies of scale have been passed on to investors. 2020 saw a full year's savings benefit of the move of Depositary and Administrator that took place during 2019 (the move was made possible due to the leveraging of relationships from the wider Waystone group post ACD acquisition).

Comparable Services: As we do not offer any similar investment products or services within the ACD, the Board is not able to assess this criterion.

Update on actions from 2019 Assessment of Value

Having reviewed with the sponsor, we recognise the need to differentiate the Kleinwort Hambros Growth fund to the peer group median for costs. Specifically, due to the fact that:

- a) the discretionary portfolio service offered for clients is embedded within the OCF for this fund. Part of this charge would, for example, include a periodic suitability review for the investor. The vast majority of the peer group will not provide a similar service in the quoted OCF cost.
- b) the fact this fund invests in other funds that will accrue extra expenses compared to a directly invested fund.

The 2020 Assessment of costs and overall rating have taken these points into consideration.

Actions to carry forward from the 2020 Assessment of Value

None.

**It should be noted that the ACD has changed name since the end of 2020. As at 31st December 2020 the ACD was named DMS Investment Management Services (UK) Limited and as from 22 March 2021 changed its name to Waystone Management (UK) Limited. The prefix of the fund names were previously 'DMS' (as seen in last year's report) subsequently these have been replaced with 'WS' in line with the ACD name change.

Disclaimer

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Source for charges data: Waystone Management (UK) Limited. All data is correct as at 31 December 2020 unless otherwise stated.